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May 26, 2011

VIA CERTIFIED MAIL,
RETURN RECEIPT REQUESTED

U.S. Environmental Protection Agency
c/o Grace Co
77 West Jackson Boulevard (SE-5J)
Chicago, IL 60604-3590

US EPA RECORDS CENTER REGION 5



412908

Re: Responses of CTS Corporation to "Request for Information Pursuant to Section 104(e) of CERCLA Lusher Street Groundwater Contamination Site, Elkhart, Indiana"

Dear Ms. Co:

This is in response to the above-referenced Request for Information regarding the Lusher Street Groundwater Contamination Site, Elkhart, Indiana (the "Site"). CTS Corporation ("CTS") voluntarily provides the following information, without admitting any liability or responsibility whatsoever in connection with the Site, under the Comprehensive Environmental Response, Compensation and Liability Act of 1980, as amended, 42 U.S.C. §9601 *et seq.* (CERCLA), the Resource Conservation and Recovery Act, as amended, 42 U.S.C. §6901 *et seq.* (RCRA) or any other statute. Any information provided by CTS is based upon a reasonable investigation and search of records kept in the ordinary course of business and the responses are based on such reasonable records search and investigation.

None of the matters that are the subject of this request, and of CTS' response, are within the personal knowledge of the undersigned. This letter constitutes the corporate response of CTS to the Request for Information.

Subject to the foregoing, CTS responds to the Information Request as follows:

Request No. 1:

State the dates during which you or your company have owned, operated, or leased a facility or any part thereof located within the boundaries of the Site and provide copies of all documents evidencing or relating to such ownership, operation, or lease arrangement (e.g. including but not limited to purchase and sale agreements, deeds, leases, etc.).

Response to Request No. 1:

To the best of CTS' knowledge and belief, CTS has not at any time owned, operated or leased a facility or any part thereof located within the boundaries of the Site. CTS maintains a manufacturing

location at 1142 West Beardsley Avenue in Elkhart, Indiana and a Corporate office at 905 West Boulevard N. (on West Boulevard, north of Beardsley Avenue). CTS at one time owned the entire tract of real property in Elkhart bordered on the south by Beardsley Avenue, on the east by West Boulevard, on the north by Mishawaka Street and on the west by N. Nappanee Street. Currently, out of that tract, CTS owns only the property at 905 West Boulevard N. where CTS' Corporate office is located. CTS also formerly had a manufacturing location at 900 West Boulevard N., across the street from its current Corporate office, but CTS no longer owns the property at 900 West Boulevard N. All of these current and former locations of CTS in Elkhart are located more than a mile north of the St. Joseph River. They are not within the boundaries of the Site.

This response is based on (1) information provided by Mr. Marvin E. Gobles, Manager, Corporate Environmental Services, who has been employed by CTS since 1978, and (2) review of relevant corporate records of CTS, including but not limited to deeds and property files.

Request No. 2:

Did you or any other person or entity ever use, purchase, store, treat, dispose, transport or otherwise handle any material containing chlorinated solvents, including but not limited to, trichloroethylene (TCE); trichloroethane (1,1,1TCA); dichloroethene (trans 1,2-DCE; cis-1,2-DCE; or 1,1-DCE) or tetrachlorethylene (PCE) at a facility within the boundaries of the Site? If the answer to this question is anything but an unqualified "no," with respect to each facility identify:

- a) the chemical composition, characteristics, physical state (e.g., solid, liquid) of each material;
- b) who supplied the material;
- c) how, when, and where the material was used, purchased, generated, stored, treated, transported, disposed of or otherwise handled;
- d) the quantity of such materials used, purchased, generated, stored, treated, transported, disposed of or otherwise handled;
- e) all supervisory personnel for areas where chlorinated solvents were identified above. For each person identified, indicate the years during which they were a supervisor and, to the best of your knowledge and belief, their duties and responsibilities.

Response to Request No. 2:

No; not applicable (see Response to Request No. 1, above).

Request No. 3:

Identify all past and present solid waste management units (e.g., waste piles, landfills, surface impoundments, waste lagoons, waste ponds or pits, tanks, container storage areas, etc.) at each facility you or your company have owned, operated, or leased within the boundaries of the Site. For each such solid waste management unit, provide the following information:

- a) A map shows the unit's boundaries and the location of all known solid waste management units, whether currently in operation or not. This map should be drawn to scale, if possible, and clearly indicate the location and size of all past and present units;
- b) The type of unit (e.g., storage area, landfill, waste pile, etc.) and the dimensions of the unit;
- c) the dates that the unit was in use;
- d) the purpose and past usage of the unit (e.g. storage, spill containment, etc.);
- e) the quantity and types of materials (hazardous substances and any other chemicals) located in each unit;
- f) the construction (materials, composition), volume, size, dates of cleaning, and condition of each unit; and
- g) if unit is no longer in use, describe how was unit was closed and what actions were taken to prevent or address potential or actual releases of waste constituents form the unit.

Response to Request No. 3:

Not applicable (see Response to Request No. 1, above).

Request No. 4:

Identify all leaks, spills, or releases into the environment of any chlorinated solvents or materials containing chlorinated solvents that have occurred at or from any facility you or your company have owned, operated, or leased within the boundaries of the Site. In addition, identify;

- a) when, where, and how such leaks, spills or releases occurred;
- b) the amount of each leak, spill or release;
- c) activities undertaken in response to each such leak, spill or release, including the notification of any agencies or governmental units;

d) investigations of the circumstances, nature, extent or location of each leak, spill or release, including the results of any soil, water (ground and surface), or air testing undertaken; and

e) all persons with information relating to these leaks, spills or releases.

Response to Request No. 4:

Not applicable (see Response to Request No. 1, above).

Request No. 5:

Provide copies of all local, state, and federal environmental permits ever granted for any facility (or any part thereof) you or your company have owned, operated, or leased within the boundaries of the Site (e.g., RCRA permits, NPDES permits, etc.)

Response to Request No. 5:

Not applicable (see Response to Request No. 1, above).

Request No. 6:

Identify any persons or entities, other than those responding to this information request, that may have information about the history, use, purchase, storage, treatment, disposal, transportation or handling of any materials containing chlorinated solvents at any facilities in the area identified as the Lusher Street Ground Water Site.

Response to Request No. 6:

Not applicable (see Response to Request No. 1, above).

Request No. 7:

To the extent you believe that another person is responsible for any leaks, spills or releases into the environment of any chlorinated solvents or materials containing chlorinated solvents at or from any facility you or your company have owned, operated, or leased within the boundaries of the Site, identify:

- a) the name and address of that person or persons;
- b) when, where, and how such leaks, spills or releases occurred;
- c) the amount of each leak, spill or release; and

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d) the detailed basis for your belief that each such person is responsible for leaks, spills or releases, including any transactional documents, reports, or other documentation supporting your belief.

Response to Request No. 7:

Not applicable (see Response to Request No. 1, above).

Please direct any future correspondence concerning this matter to the undersigned. My telephone number is (574) 523-3800 and my e-mail address is elizabeth.ahlemann@ctscorp.com.

Very truly yours,

CTS Corporation




Elizabeth Bottorff Ahlemann
Assistant General Counsel

CERTIFICATION

I certify under penalty of law that this document was prepared under my direction or supervision in accordance with a system that is designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based upon my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

CTS Corporation



Richard G. Cutter III
Vice President Law
& Business Affairs;
Corporate Secretary

CTS[®]

Electronic Components
and Electronic Assemblies

CTS Corporation
Corporate Offices

905 West Boulevard North
Elkhart, Indiana 46514 U.S.A.

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